



COUNTY OF PRINCE WILLIAM

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DEPARTMENT OF
PUBLIC WORKS

Robert W. Wilson
Director

July 11, 2005

Mr. W. Timothy Lough, Ph.D., P.E.
Special Projects Engineer
Division of Energy Regulation
P.O. Box 1197
Richmond, Virginia 23218

Dear Mr. Lough:

Thank you very much for the opportunity to participate in the study of implications arising when local governments request that proposed electrical transmission lines be installed underground. Prince William County would like to participate in this study. Our contact person and address is:

Mr. Matthew E. Groff
Department of Public Works
Office of Director
4379 Ridgewood Drive
Woodbridge, Virginia 22192
(703) 792-7183
mgroff@pwcgov.org

Our responses to the questions are as follows:

- 1. Should a locality requesting the SCC's consideration of an underground transmission line alternative be required to participate as a formal party to the proceeding in which it proposes such an alternative, i.e., should it be required to be a Respondent pursuant to Rule 80 of the Commission's Rules (5 VAC-20-80)? Explain.**

Localities should not be required to participate as a formal party to the proceeding. Localities may simply want to weigh in as a public witness. If, however, the issue is really critical to a locality, then it could become a formal party to the case.



- 2. Should any locality requesting the SCC's consideration of an underground transmission line alternative be obligated to develop and submit to the SCC a proposal detailing that alternative, providing evidentiary support for that proposal, and having the burden of proof therefore? If not, why not.**

No. The development and submission of alternatives would be cost prohibitive to localities. An expert engineering firm would have to be hired to perform the detailed engineering. If utilities are not compelled to provide these alternatives, then the utilities must be compelled to cooperate with localities to provide key data that only utilities can provide.

- 3. Should a locality requesting the SCC's consideration of an underground transmission line alternative be obligated to propose such an alternative not later than a date corresponding to a specific procedural milestone established in the docket's scheduling order? If so, which procedural milestone? If not, why not?**

No. If localities were compelled to provide alternatives, then the SCC deadlines may need to be extended. Recommendations made by localities on issues such as transmission lines would have to go to the governing body for approval prior to submission to the SCC. Since transmission lines are a particularly sensitive issue, the local governing body would be justified in obtaining public input prior to a formal decision on the alternative and prior to submission to the SCC. This would potentially prolong the process that the SCC currently has in place.

- 4. Should the applicant utility, itself, have the obligation to develop an underground transmission line alternative if such an alternative's consideration by the SCC is requested by a locality? If so, what should be the locality's role in that alternative's development, if any? Additionally, should the cost of such an alternative's development be borne entirely by the applicant utility? If not, why not?**

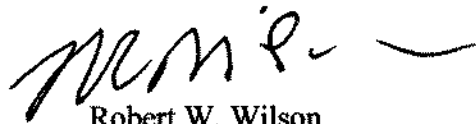
Yes. Only the SCC or General Assembly has the authority to force utilities to develop an underground transmission line alternative. Utilities should bear the full costs of developing underground transmission line proposals.

- 5. Are there any additional procedural or evidentiary issues that the Commission should consider as part of this study? If so, please elaborate.**

None at this time.

Thank you for the opportunity to provide comments on this issue. We look forward to participating in this study.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Wilson', followed by a horizontal flourish.

Robert W. Wilson
Director of Public Works

Cc: Board of County Supervisors
County Executive
Acting County Attorney
Director of Legislative Affairs